

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:
Case No. 18-op-45749-DAP

THE BLACKFEET TRIBE OF THE
BLACKFEET RESERVATION,

Plaintiffs,

vs.

PURDUE PHARMA, L.P. et al.,

Defendants.

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

DEFENDANT ANDA
PHARMACEUTICALS, INC.'S ANSWER
TO CORRECTED FIRST AMENDED
COMPLAINT

Defendant Anda Pharmaceuticals, Inc. (“Anda”) hereby answers Plaintiff The Blackfeet Tribe of the Blackfeet Reservation’s (“Plaintiff” or “Blackfeet Nation”) Corrected First Amended Complaint (“CFAC”) as follows:

PRELIMINARY STATEMENT

Though the CFAC purports to be directed to Anda, it improperly refers to “Defendants” (presumably meaning other, unrelated pharmaceutical companies named in the CFAC), and/or third parties on a collective basis, failing to plead with requisite particularity the allegations against Anda individually. This is insufficient to apprise Anda of the allegations asserted against it and conduct, statements, documents, or other information attributed to Defendants on a collective basis are not attributable to Anda specifically and do not plead a case against Anda with the specificity required by the Federal Rules of Civil Procedure. Anda nevertheless has endeavored to respond to Plaintiffs’ allegations to the extent possible.

To the extent the CFAC’s allegations refer to the knowledge, conduct, or actions of other persons or entities, Anda is generally without knowledge or information sufficient to form a belief as to the truth of those allegations and, on that basis, generally and specifically denies all such allegations. Anda states that it is answering Plaintiffs’ allegations solely on behalf of itself, even when the allegations collectively refer to alleged conduct by Defendants and other persons or entities.

The CFAC also contains purported quotations from a number of sources, some of which are unidentified. In answering allegations consisting of quoted or paraphrased language, Anda’s failure to specifically deny that the language quoted or paraphrased was contained in a document or uttered by the person or entity to which it is attributed, or Anda’s reference to the full document instead of the quoted or paraphrased language shall not constitute an admission that the substantive

content of the source(s) quoted or paraphrased is or is not true, or that the material is relevant or admissible in this action.

Anda denies each and every allegation contained in the CFAC, except as specifically admitted herein, and any factual allegation admitted herein is admitted only as to the specific facts alleged and not as to any conclusions, characterizations, implications, innuendos, or speculation contained in any allegation or in the CFAC as a whole. Moreover, Anda specifically denies any allegations contained in headings, footnotes, or unnumbered paragraphs in the CFAC.

These comments and objections are incorporated, to the extent appropriate, into each numbered paragraph of this Answer.

ANSWER

Now answering the allegations and averments of the CFAC paragraph by paragraph, Anda states as follows:

1. Paragraph 1 purports to be a characterization of Plaintiffs' claims and consists of statements of opinion rather than facts and accordingly requires no response by Anda; to the extent a response is required, denied. To the extent the allegations contained in paragraph 1 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

INTRODUCTION

2. Paragraph 2 purports to be a characterization of Plaintiffs' claims and consists of statements of opinion rather than facts and accordingly requires no response by Anda; to the extent a response is required, denied. To the extent the allegations contained in paragraph 2 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is

without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

3. To the extent the allegations contained in paragraph 3 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 3 that pertains to Anda.

4. The allegations contained in paragraph 4 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

5. The allegations contained in paragraph 5 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

6. The allegations contained in paragraph 6 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

7. The allegations contained in paragraph 7 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

8. The allegations contained in paragraph 8 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

9. To the extent the allegations contained in paragraph 9 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 9 that pertains to Anda.

10. The allegations contained in paragraph 10 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

11. The allegations contained in paragraph 11 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

12. The allegations contained in paragraph 12 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

13. The allegations contained in paragraph 13 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

14. To the extent the allegations contained in paragraph 14 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 14 that pertains to Anda.

15. To the extent the allegations contained in paragraph 15 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 15 that pertains to Anda.

16. To the extent the allegations contained in paragraph 16 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 16 that pertains to Anda.

17. To the extent the allegations contained in paragraph 17 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 17 that pertains to Anda.

18. To the extent the allegations contained in paragraph 18 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 18 that pertains to Anda.

19. To the extent the allegations contained in paragraph 19 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 19 that pertains to Anda.

20. To the extent the allegations contained in paragraph 20 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 20 that pertains to Anda.

21. To the extent the allegations contained in paragraph 21 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 21 that pertains to Anda.

22. The allegations contained in paragraph 22 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

23. To the extent the allegations contained in paragraph 23 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 23 that pertains to Anda.

JURISDICTION AND VENUE

24. The allegations contained in paragraph 24 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 24 that pertain to Anda.

25. The allegations contained in paragraph 25 consist of legal conclusions to which to no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 25 that pertain to Anda.

26. The allegations contained in paragraph 26 consist of legal conclusions to which to no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 26 that pertain to Anda.

27. The allegations contained in paragraph 27 consist of legal conclusions to which to no response is required. Further, Anda objects to personal jurisdiction pursuant to 18 U.S.C. § 1965(b) on the grounds that the CFAC does not name Anda in its claims pursuant to 18 U.S.C. § 1965(b). To the extent is a response is required, Anda denies all allegations contained in paragraph 27 that pertain to Anda.

28. The allegations contained in paragraph 28 consist of legal conclusions to which to no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 28 that pertain to Anda.

29. The allegations contained in paragraph 29 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 29 that pertain to Anda.

DEFENDANTS

I. PLAINTIFF

30. The allegations contained in paragraph 30 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

31. The allegations contained in paragraph 31 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

32. The allegations contained in paragraph 32 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

33. The allegations contained in paragraph 33 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

34. The allegations contained in paragraph 34 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 34 that pertain to Anda.

35. To the extent the allegations contained in paragraph 35 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 35 that pertains to Anda.

36. The allegations contained in paragraph 36 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

II. DEFENDANTS

37-80. The allegations contained in paragraphs 37-80 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

81. To the extent the allegations contained in paragraph 81 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 81 that pertain to Anda. Further, to the extent that paragraph 81 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 81 that pertains to Anda.

82-90. The allegations contained in paragraphs 82-90 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

91. Anda admits that it is a distributor of, among other things, prescription opioids in the United States and, during the time period at issue, within the State of Montana. Anda further admits that it is licensed by the DEA and applicable states to distribute controlled substances to licensed customers. Anda admits that it is a Florida corporation with its principal address in Olive Branch, Mississippi, and that it is registered to do business in the State of Montana. Anda denies each and every remaining allegation contained in paragraph 91.

92-95. The allegations contained in paragraphs 92-95 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

96. To the extent the allegations contained in paragraph 96 consist of characterizations of Anda and Defendants other than Anda, no response is required. Anda denies each and every remaining allegation contained in paragraph 96 that pertains to Anda.

97. To the extent the allegations contained in paragraph 97 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations

contained in paragraph 97 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 97 that pertains to Anda.

98. To the extent the allegations contained in paragraph 98 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 98 that pertain to Anda. To the extent the allegations contained in paragraph 98 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

FACTUAL ALLEGATIONS

I. FACTS COMMON TO ALL CLAIMS

99. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 99 and, therefore, denies them.

100. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100 and, therefore, denies them.

101-140. The allegations contained in paragraphs 101-140 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

141. To the extent the allegations contained in paragraph 141 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 141 that pertains to Anda.

142. To the extent the allegations contained in paragraph 142 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 142 that pertains to Anda.

143. To the extent the allegations contained in paragraph 143 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 143 that pertains to Anda.

144-468. The allegations contained in paragraphs 144-468 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

469. To the extent the allegations contained in paragraph 469 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 469 that pertains to Anda.

470. The allegations contained in paragraphs 470 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

471. The allegations contained in paragraphs 471 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

472. The allegations contained in paragraphs 472 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

473. To the extent the allegations contained in paragraph 473 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 473 that pertains to Anda.

474. To the extent the allegations contained in paragraph 474 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 474 that pertains to Anda.

475. To the extent the allegations contained in paragraph 475 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 475 that pertains to Anda.

476. To the extent the allegations contained in paragraph 476 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 98 that pertain to Anda. To the extent the allegations contained in paragraph 476 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the

truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 476 that pertains to Anda.

477. To the extent the allegations contained in paragraph 477 consist of legal conclusions no response is required. Further, to the extent that paragraph 477 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. To the extent is a response is required, Anda admits only that it is required to and has registered as a distributor pursuant to 21 U.S.C. § 823 and 21 C.F.R. §§ 1301.11, 1301.74. Anda denies each and every remaining allegation contained in paragraph 477 that pertains to Anda.

478. The allegations contained in paragraph 478 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

479. To the extent the allegations contained in paragraph 479 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 479 that pertains to Anda.

480. To the extent the allegations contained in paragraph 480 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 480 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 480 that pertains to Anda.

481. To the extent the allegations contained in paragraph 481 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such

allegations contained in paragraph 481 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 481 that pertains to Anda.

482. To the extent the allegations contained in paragraph 482 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 482 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 482 that pertains to Anda.

483. To the extent the allegations contained in paragraph 483 consist of legal conclusions no response is required. Further, to the extent that paragraph 483 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. To the extent a response is required, Anda admits only that it is required to and has registered as a distributor pursuant to 21 U.S.C. § 823 and 21 C.F.R. §§ 1301.11, 1301.74. Anda denies each and every remaining allegation contained in paragraph 483 that pertains to Anda.

484. To the extent the allegations contained in paragraph 484 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 484 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 484 that pertains to Anda.

485. To the extent the allegations contained in paragraph 485 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 485 that pertain to Anda. Further, to the extent that paragraph 485 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 485 that pertains to Anda.

486. To the extent the allegations contained in paragraph 486 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 486 that pertain to Anda. Further, to the extent that paragraph 486 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 486 that pertains to Anda.

487. To the extent the allegations contained in paragraph 487 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 487 that pertain to Anda. Further, to the extent that paragraph 487 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 487 that pertains to Anda.

488. To the extent the allegations contained in paragraph 488 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 488 that pertain to Anda. Further, to the extent that paragraph 488 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 488 that pertains to Anda.

489. To the extent the allegations contained in paragraph 489 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 489 that pertain to Anda. Further, to the extent that paragraph 489 purports to be based on statutes, regulations and/or government publications, those statutes,

regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 489 that pertains to Anda.

490. To the extent the allegations contained in paragraph 490 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 490 that pertain to Anda. Further, to the extent that paragraph 490 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 490 that pertains to Anda.

491. To the extent the allegations contained in paragraph 491 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 491 that pertain to Anda. Further, to the extent that paragraph 491 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 491 that pertains to Anda.

492. To the extent the allegations contained in paragraph 492 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 492 that pertain to Anda. Further, to the extent that paragraph 492 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 492 that pertains to Anda.

493. To the extent the allegations contained in paragraph 493 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 493 that pertain to Anda. Further, to the extent that paragraph

493 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 493 that pertains to Anda.

494. To the extent the allegations contained in paragraph 494 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 494 that pertain to Anda. Further, to the extent the allegations contained in paragraph 494 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 494 that pertains to Anda.

495. To the extent the allegations contained in paragraph 495 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 495 that pertains to Anda.

496. To the extent the allegations contained in paragraph 496 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 496 that pertain to Anda. Further, to the extent that paragraph 496 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 496 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or

information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 496 that pertains to Anda.

497. To the extent the allegations contained in paragraph 497 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 497 that pertain to Anda. Further, to the extent the allegations contained in paragraph 497 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 497 that pertains to Anda.

498. To the extent the allegations contained in paragraph 498 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 498 that pertains to Anda.

499. To the extent the allegations contained in paragraph 499 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 499 that pertains to Anda.

500. The allegations contained in paragraph 500 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

501. To the extent the allegations contained in paragraph 501 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 501 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that during the time period relevant to this action, it was a member of HDA. Anda denies each and every remaining allegation contained in paragraph 501 that pertains to Anda.

502. To the extent the allegations contained in paragraph 502 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 502 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that during the time period relevant to this action, employees of Anda have attended one or more events where representatives of the DEA discussed the distribution of opioids. Anda denies each and every remaining allegation contained in paragraph 502 that pertains to Anda.

503. To the extent the allegations contained in paragraph 503 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 503 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all

characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 503 that pertains to Anda.

504. To the extent the allegations contained in paragraph 504 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 504 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 504 that pertains to Anda.

505-512. The allegations contained in paragraphs 505-512 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

513. To the extent the allegations contained in paragraph 513 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 513 that pertains to Anda.

514. To the extent the allegations contained in paragraph 514 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 514 that pertains to Anda.

515. To the extent the allegations contained in paragraph 515 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 515 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 515 that pertains to Anda.

516. To the extent the allegations contained in paragraph 516 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 516 that pertains to Anda.

517. To the extent the allegations contained in paragraph 517 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 517 that pertains to Anda.

518. The allegations contained in paragraph 518 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

519. The allegations contained in paragraph 519 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

Further, to the extent the allegations contained in paragraph 519 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

520. To the extent the allegations contained in paragraph 520 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 520 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 520 that pertains to Anda.

521. To the extent the allegations contained in paragraph 521 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 521 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that during the time period relevant to this action it was a member of HDA. Anda denies each and every remaining allegation contained in paragraph 521 that pertains to Anda.

522. To the extent the allegations contained in paragraph 522 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 522 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all

characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 522 that pertains to Anda.

523. The allegations contained in paragraph 523 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 523 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

524. The allegations contained in paragraph 524 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 524 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

525. To the extent the allegations contained in paragraph 525 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 525 that pertains to Anda.

526. To the extent the allegations contained in paragraph 526 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 526 purport to quote from,

summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that HDA has, during the relevant time period, held conferences, business meetings and other events, some of which were attended by Anda employees. Anda denies each and every remaining allegation contained in paragraph 526 that pertains to Anda.

527. To the extent the allegations contained in paragraph 527 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 527 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that as a member of HDA, it was eligible to participate on councils, committees, task forces and working groups. Anda denies each and every remaining allegation contained in paragraph 527 that pertains to Anda.

528. To the extent the allegations contained in paragraph 528 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 528 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 528 that pertains to Anda.

529. To the extent the allegations contained in paragraph 529 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 529 that pertains to Anda.

530. To the extent the allegations contained in paragraph 530 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 530 that pertains to Anda.

531. To the extent the allegations contained in paragraph 531 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 531 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 531 that pertains to Anda.

532. To the extent the allegations contained in paragraph 532 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 532 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 532 that pertains to Anda.

533. To the extent the allegations contained in paragraph 533 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 533 that pertains to Anda.

534. To the extent the allegations contained in paragraph 534 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 534 that pertains to Anda.

535. To the extent the allegations contained in paragraph 535 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 535 that pertains to Anda.

536. To the extent the allegations contained in paragraph 536 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 536 that pertain to Anda. Further, to the extent that paragraph 536 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 536 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 536 that pertains to Anda.

537. To the extent the allegations contained in paragraph 537 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 537 that pertains to Anda.

538. To the extent the allegations contained in paragraph 538 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 538 that pertains to Anda.

539. To the extent the allegations contained in paragraph 539 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 539 purport to quote from, summarize or characterize the ARCOS database, all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 539 that pertains to Anda.

540. To the extent the allegations contained in paragraph 540 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 540 that pertains to Anda.

541. To the extent the allegations contained in paragraph 541 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 541 that pertains to Anda.

542. To the extent the allegations contained in paragraph 542 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 542 that pertains to Anda.

543. To the extent the allegations contained in paragraph 543 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 543 purport to quote from, summarize or characterize datasets, all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 543 that pertains to Anda.

544. To the extent the allegations contained in paragraph 544 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it implemented a system to conduct due diligence of each of its customers purchasing controlled substances which includes, but is not limited to, the collection of information through customer questionnaires and dispensing data. Anda expressly denies the characterizations of Anda's practices contained in paragraph 544. Anda denies each and every remaining allegation contained in paragraph 544 that pertains to Anda.

545. To the extent the allegations contained in paragraph 545 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 545 purport to quote from, summarize or characterize datasets, all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 545 that pertains to Anda.

546. To the extent the allegations contained in paragraph 546 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 546 purport to quote from, summarize or characterize datasets, all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 546 that pertains to Anda.

547. To the extent the allegations contained in paragraph 547 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 547 that pertains to Anda.

548. To the extent the allegations contained in paragraph 548 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 548 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all

characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 548 that pertains to Anda.

549. To the extent the allegations contained in paragraph 549 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 549 that pertains to Anda.

550. To the extent the allegations contained in paragraph 550 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda expressly denies that any of the referenced “registrant actions” “orders to show cause” and/or “immediate suspension orders” involved or related to Anda in anyway. Anda denies each and every remaining allegation contained in paragraph 550 that pertains to Anda.

551. To the extent the allegations contained in paragraph 551 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 551 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 551 that pertains to Anda.

552. To the extent the allegations contained in paragraph 552 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 552 that pertains to Anda.

553. To the extent the allegations contained in paragraph 553 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 553 that pertains to Anda.

554. To the extent the allegations contained in paragraph 554 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 554 that pertains to Anda.

555. To the extent the allegations contained in paragraph 555 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 555 that pertains to Anda.

556. To the extent the allegations contained in paragraph 556 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 556 that pertains to Anda.

557. The allegations contained in paragraph 557 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

558. To the extent the allegations contained in paragraph 558 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 558 that pertains to Anda.

559. The allegations contained in paragraph 559 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

560. The allegations contained in paragraph 560 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 560 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

561. The allegations contained in paragraph 561 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 561 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

562. The allegations contained in paragraph 562 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

563. The allegations contained in paragraph 563 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

564. To the extent the allegations contained in paragraph 564 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 564 that pertains to Anda.

565. To the extent the allegations contained in paragraph 565 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 565 that pertains to Anda.

566-571. The allegations contained in paragraphs 566-571 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 566-571 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

572. To the extent the allegations contained in paragraph 572 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 572 that pertains to Anda.

573. To the extent the allegations contained in paragraph 573 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 573 that pertains to Anda.

574. To the extent the allegations contained in paragraph 574 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 574 that pertains to Anda.

575. To the extent the allegations contained in paragraph 575 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 575 that pertains to Anda.

576. To the extent the allegations contained in paragraph 576 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 576 that pertains to Anda.

577. To the extent the allegations contained in paragraph 577 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 577 that pertains to Anda.

578. To the extent the allegations contained in paragraph 578 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 578 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 578 that pertains to Anda.

579. To the extent the allegations contained in paragraph 579 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 579 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that at all times relevant hereto its conduct was in compliance with the law. Anda denies each and every remaining allegation contained in paragraph 579 that pertains to Anda.

580-584. The allegations contained in paragraphs 580-584 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

585. To the extent the allegations contained in paragraph 585 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 585 that pertains to Anda.

586-650. The allegations contained in paragraphs 586-650 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

651. To the extent the allegations contained in paragraph 651 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 651 that pertain to Anda. Further, to the extent the allegations contained in paragraph 651 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 651 that pertains to Anda.

652. To the extent the allegations contained in paragraph 652 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 652 that pertain to Anda. Further, to the extent that paragraph 652 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all

characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 652 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 652 that pertains to Anda.

653. To the extent the allegations contained in paragraph 653 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 653 that pertain to Anda. Further, to the extent that paragraph 653 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 653 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 653 that pertains to Anda.

654. To the extent the allegations contained in paragraph 654 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 654 that pertains to Anda.

655-659. The allegations contained in paragraphs 655-659 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

660. To the extent the allegations contained in paragraph 660 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 660 that pertains to Anda.

661. To the extent the allegations contained in paragraph 661 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 661 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 661 that pertains to Anda.

662. The allegations contained in paragraph 662 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 662 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

663. The allegations contained in paragraph 663 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 663 purport to quote from, summarize

or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

664. The allegations contained in paragraph 664 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 664 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

665. To the extent the allegations contained in paragraph 665 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 665 that pertains to Anda.

666-669. The allegations contained in paragraphs 666-669 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

670. To the extent the allegations contained in paragraph 670 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 670 that pertains to Anda.

671. To the extent the allegations contained in paragraph 671 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 671 that pertains to Anda.

672. To the extent the allegations contained in paragraph 672 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 672 that pertains to Anda.

673-677. The allegations contained in paragraphs 673-677 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

678. To the extent the allegations contained in paragraph 678 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 678 that pertains to Anda.

679-693. The allegations contained in paragraphs 679-693 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

694. To the extent the allegations contained in paragraph 678 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 678 that pertains to Anda.

695. The allegations contained in paragraph 695 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

696. To the extent the allegations contained in paragraph 696 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 696 purport to quote from, summarize or characterize datasets, all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 696 that pertains to Anda.

697. The allegations contained in paragraph 697 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

698. To the extent the allegations contained in paragraph 698 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 698 purport to quote from, summarize or characterize datasets, all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 698 that pertains to Anda.

699. To the extent the allegations contained in paragraph 699 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Further, to the extent the allegations contained in paragraph 699 purport to quote from, summarize or characterize datasets, all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 699 that pertains to Anda.

700. To the extent the allegations contained in paragraph 700 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 700 that pertains to Anda.

701-713. The allegations contained in paragraphs 701-713 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

714. To the extent the allegations contained in paragraph 714 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 714 that pertains to Anda.

715. To the extent the allegations contained in paragraph 715 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 715 that pertains to Anda.

716. To the extent the allegations contained in paragraph 716 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 716 that pertains to Anda.

717. To the extent the allegations contained in paragraph 717 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 717 that pertains to Anda.

718. To the extent the allegations contained in paragraph 718 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 718 that pertains to Anda.

719. To the extent the allegations contained in paragraph 719 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 719 that pertains to Anda.

720. To the extent the allegations contained in paragraph 720 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 720 that pertains to Anda.

721. To the extent the allegations contained in paragraph 721 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 721 that pertains to Anda.

722. To the extent the allegations contained in paragraph 722 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 722 that pertain to Anda. To the extent the allegations contained in paragraph 722 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 722 that pertains to Anda.

723. To the extent the allegations contained in paragraph 723 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 723 that pertain to Anda. To the extent the allegations contained in paragraph 723 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 723 that pertains to Anda.

724. To the extent the allegations contained in paragraph 724 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 724 that pertains to Anda.

725. The allegations contained in paragraph 725 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

726. To the extent the allegations contained in paragraph 726 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 726 that pertains to Anda.

727. To the extent the allegations contained in paragraph 727 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 727 that pertains to Anda.

728. The allegations contained in paragraph 728 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

729. To the extent the allegations contained in paragraph 729 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 729 purport to quote from, summarize or characterize the information contained in documents, those documents speaks

for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 729 that pertains to Anda.

730. To the extent the allegations contained in paragraph 730 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 730 that pertains to Anda.

731. To the extent the allegations contained in paragraph 731 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 731 that pertains to Anda.

732. To the extent the allegations contained in paragraph 732 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 732 that pertains to Anda.

733. To the extent the allegations contained in paragraph 733 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 733 that pertains to Anda.

734. To the extent the allegations contained in paragraph 734 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 734 that pertains to Anda.

735. To the extent the allegations contained in paragraph 735 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 735 that pertains to Anda.

736-746. The allegations contained in paragraphs 736-746 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

747. To the extent the allegations contained in paragraph 747 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 747 that pertains to Anda.

748. To the extent the allegations contained in paragraph 748 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 748 purport to quote from, summarize or characterize the information contained in documents or other media, those

documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 748 that pertains to Anda.

749. To the extent the allegations contained in paragraph 749 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 749 purport to quote from, summarize or characterize the information contained in documents, those documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 749 that pertains to Anda.

750-762. The allegations contained in paragraphs 750-762 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 750-762 purport to quote from, summarize or characterize the information contained in documents, those documents speaks for themselves, and all characterizations thereof are denied.

763. To the extent the allegations contained in paragraph 763 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 763 that pertains to Anda.

II. FACTS COMMON TO CLAIMS UNDER RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ("RICO") ACT

764-827. The allegations contained in paragraphs 764-827 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and specifically are directed to claims

which are not asserted against Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

Violation of RICO, 18 U.S.C. § 1961 *et seq.*—Opioid Marketing Enterprise (Against Purdue, Cephalon, Janssen, Endo, and Mallinckrodt (the “RICO Marketing Defendants”))

828. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-827 of the CFAC.

829-855. The allegations contained in paragraphs 829-855 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

SECOND CLAIM FOR RELIEF

Violation of RICO, 18 U.S.C. § 1961 *et seq.*—Opioid Supply Chain Enterprise (Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen—“RICO Supply Chain Defendants”)

856. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-855 of the CFAC.

857-887. The allegations contained in paragraphs 857-887 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

THIRD CLAIM FOR RELIEF

Public Nuisance Federal Common Law (Against All Defendants)

888. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-887 of the CFAC.

889. The allegations contained in paragraph 889 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 889 that pertain to Anda. Further, to the extent that paragraph 889 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 889 that pertains to Anda.

890. The allegations contained in paragraph 890 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 890 that pertain to Anda. Further, to the extent that paragraph 890 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 890 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 890 that pertains to Anda.

891. The allegations contained in paragraph 891 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 891 that pertain to Anda. Further, to the extent that paragraph 891 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 891 that pertains to Anda.

892. To the extent the allegations contained in paragraph 892 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 892 that pertains to Anda.

893. The allegations contained in paragraph 893 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

894. The allegations contained in paragraph 894 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 894 that pertain to Anda. Further, to the extent that paragraph 894 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 894 that pertains to Anda.

895. To the extent the allegations contained in paragraph 895 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 895 that pertains to Anda.

896. To the extent the allegations contained in paragraph 896 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 896 that pertains to Anda.

897. The allegations contained in paragraph 897 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 897 that pertain to Anda.

898. To the extent the allegations contained in paragraph 898 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 898 that pertains to Anda.

899. To the extent the allegations contained in paragraph 899 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 899 that pertains to Anda.

900. To the extent the allegations contained in paragraph 900 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 900 that pertains to Anda.

901. To the extent the allegations contained in paragraph 901 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 901 that pertains to Anda.

902. To the extent the allegations contained in paragraph 902 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 902 that pertains to Anda.

903. To the extent the allegations contained in paragraph 903 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 903 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 903 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 903 that pertains to Anda.

904. To the extent the allegations contained in paragraph 904 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 904 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 904 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 904 that pertains to Anda.

905. To the extent the allegations contained in paragraph 905 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 905 consist of legal conclusions, no

response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 905 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 905 that pertains to Anda.

906. To the extent the allegations contained in paragraph 906 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 906 consist of legal conclusions, no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 906 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 906 that pertains to Anda.

907. The allegations contained in paragraph 907 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 907 that pertain to Anda. To the extent is a response is required, Anda denies all such allegations contained in paragraph 907 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 907 that pertains to Anda.

908. To the extent the allegations contained in paragraph 908 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 908 consist of legal conclusions, no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 908 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 908 that pertains to Anda.

909. The allegations contained in paragraph 909 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 909 that pertain to Anda. To the extent a response is required, Anda denies all such allegations contained in paragraph 909 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 909 that pertains to Anda.

910. To the extent the allegations contained in paragraph 910 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 910 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 910 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 910 that pertains to Anda.

911. The allegations contained in paragraph 911 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 911 that pertain to Anda.

912. The allegations contained in paragraph 912 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 912 that pertain to Anda and especially denies that Plaintiffs are entitled to any such relief against Anda.

FOURTH CLAIM FOR RELIEF

State Common Law Public Nuisance (Against All Defendants)

913. The allegations contained in paragraph 913 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 913 that pertain to Anda.

914. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-913 of the CFAC.

915. The allegations contained in paragraph 915 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 915 that pertain to Anda.

916. The allegations contained in paragraph 916 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 916 that pertain to Anda.

917. To the extent the allegations contained in paragraph 917 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 917 that pertains to Anda.

918. To the extent the allegations contained in paragraph 918 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 918 consist of legal conclusions, no response is required. To the extent is a response is required, Anda denies all such allegations

contained in paragraph 918 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 918 that pertains to Anda.

919. The allegations contained in paragraph 919 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 919 that pertain to Anda. To the extent a response is required, Anda denies all such allegations contained in paragraph 919 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 919 that pertains to Anda.

920. The allegations contained in paragraph 920 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 920 that pertain to Anda. Further, to the extent that paragraph 920 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 920 that pertains to Anda.

921. The allegations contained in paragraph 921 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 921 that pertain to Anda. Further, to the extent that paragraph 921 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 921 that pertains to Anda.

922. To the extent the allegations contained in paragraph 922 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 922 consist of legal conclusions, no

response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 922 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 922 that pertains to Anda.

923. To the extent the allegations contained in paragraph 923 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 923 consist of legal conclusions, no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 923 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 923 that pertains to Anda.

924. To the extent the allegations contained in paragraph 924 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 924 that pertains to Anda.

925. To the extent the allegations contained in paragraph 925 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 925 that pertains to Anda.

926. To the extent the allegations contained in paragraph 926 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Further, to the extent that paragraph 926 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 926 that pertains to Anda.

927. To the extent the allegations contained in paragraph 927 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 927 that pertains to Anda.

928. To the extent the allegations contained in paragraph 928 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 928 that pertains to Anda.

929. To the extent the allegations contained in paragraph 929 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 929 that pertains to Anda.

930. To the extent the allegations contained in paragraph 930 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 930 that pertains to Anda.

931. To the extent the allegations contained in paragraph 931 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 931 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 931 that pertain to Anda. Further, to the extent that paragraph 931 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 931 that pertains to Anda.

932. To the extent the allegations contained in paragraph 932 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 932 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 932 that pertain to Anda. Further, to the extent that paragraph 932 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 932 that pertains to Anda.

933. To the extent the allegations contained in paragraph 933 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 933 that pertains to Anda.

934. To the extent the allegations contained in paragraph 934 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 934 that pertains to Anda.

935. The allegations contained in paragraph 935 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

936. The allegations contained in paragraph 936 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

937. The allegations contained in paragraph 937 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

938. To the extent the allegations contained in paragraph 938 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it is in the business of distributing prescription drugs, including opioids many of which have been determined to be substances posing a high potential for abuse and addiction. Anda denies each and every remaining allegation contained in paragraph 938 that pertains to Anda.

939. To the extent the allegations contained in paragraph 939 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 939 that pertains to Anda.

940. To the extent the allegations contained in paragraph 940 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it had control over its own conduct in Plaintiffs' communities regarding its own shipments of opioids, its reporting activity, and its anti-diversion policies and procedures. Anda denies each and every remaining allegation contained in paragraph 940 that pertains to Anda.

941. To the extent the allegations contained in paragraph 941 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 941 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 941 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 941 that pertains to Anda.

942. To the extent the allegations contained in paragraph 942 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 942 that pertains to Anda.

943. To the extent the allegations contained in paragraph 943 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 943 that pertains to Anda.

944. To the extent the allegations contained in paragraph 944 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 944 that pertains to Anda.

945. To the extent the allegations contained in paragraph 945 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 945 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 945 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 945 that pertains to Anda.

946. To the extent the allegations contained in paragraph 946 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 946 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations

contained in paragraph 946 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 946 that pertains to Anda.

947. To the extent the allegations contained in paragraph 947 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 947 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 947 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 947 that pertains to Anda.

948. To the extent the allegations contained in paragraph 948 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 948 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 948 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 948 that pertains to Anda.

949. To the extent the allegations contained in paragraph 949 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 949 that pertains to Anda.

950. To the extent the allegations contained in paragraph 950 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 950 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 950 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 950 that pertains to Anda.

951. The allegations contained in paragraph 951 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

952. To the extent the allegations contained in paragraph 952 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 952 that pertains to Anda.

953. To the extent the allegations contained in paragraph 953 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 953 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 953 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 953 that pertains to Anda.

954. The allegations contained in paragraph 954 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 954 that pertain to Anda.

955. To the extent the allegations contained in paragraph 955 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 955 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 955 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 955 that pertains to Anda.

956. To the extent the allegations contained in paragraph 956 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 956 that pertains to Anda.

957. To the extent the allegations contained in paragraph 957 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 957 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 957 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 957 that pertains to Anda.

958. To the extent the allegations contained in paragraph 958 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 958 consist of legal conclusions, no

response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 958 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 958 that pertains to Anda.

959. To the extent the allegations contained in paragraph 959 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 959 consist of legal conclusions, no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 959 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 959 that pertains to Anda.

960. The allegations contained in paragraph 960 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 960 that pertain to Anda and especially denies that Plaintiffs are entitled to any such relief against Anda.

FIFTH CLAIM FOR RELIEF

Statutory Public Nuisance (Against All Defendants)

961. The allegations contained in paragraph 961 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 961 that pertain to Anda.

962. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-961 of the CFAC.

963. The allegations contained in paragraph 963 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations

contained in paragraph 963 that pertain to Anda. Further, to the extent that paragraph 963 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 963 that pertains to Anda.

964. The allegations contained in paragraph 964 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 964 that pertain to Anda. Further, to the extent that paragraph 964 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 964 that pertains to Anda.

965. The allegations contained in paragraph 965 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 965 that pertain to Anda. Further, to the extent that paragraph 965 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 965 that pertains to Anda.

966. To the extent the allegations contained in paragraph 966 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 966 consist of legal conclusions, no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 966 that pertain to Anda. Further, to the extent that paragraph 966 purports to be based on statutes, regulations and/or government publications, those statutes, regulations,

and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 966 that pertains to Anda.

967. To the extent the allegations contained in paragraph 967 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 967 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 967 that pertain to Anda. Further, to the extent that paragraph 967 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 967 that pertains to Anda.

968. To the extent the allegations contained in paragraph 968 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 968 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 968 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 968 that pertains to Anda.

969. To the extent the allegations contained in paragraph 969 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 969 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations

contained in paragraph 969 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 969 that pertains to Anda.

970. The allegations contained in paragraph 970 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 970 that pertain to Anda.

971. The allegations contained in paragraph 971 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 971 that pertain to Anda.

972. To the extent the allegations contained in paragraph 972 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 972 that pertains to Anda.

973. The allegations contained in paragraph 973 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 973 that pertain to Anda and especially denies that Plaintiffs are entitled to any such relief against Anda.

974. The allegations contained in paragraph 974 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 974 that pertain to Anda and especially denies that Plaintiffs are entitled to any such relief against Anda.

SIXTH CLAIM FOR RELIEF

Negligence and Negligent Misrepresentation (Against All Defendants)

975. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-974 of the CFAC.

976. To the extent the allegations contained in paragraph 976 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 976 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 976 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 976 that pertains to Anda.

977. The allegations contained in paragraph 977 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 977 that pertain to Anda.

978. The allegations contained in paragraph 978 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 978 that pertain to Anda.

979. To the extent the allegations contained in paragraph 979 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 979 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations

contained in paragraph 979 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 979 that pertains to Anda.

980. The allegations contained in paragraph 980 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 980 that pertain to Anda.

981. To the extent the allegations contained in paragraph 981 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 981 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 981 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 981 that pertains to Anda.

982. To the extent the allegations contained in paragraph 982 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 982 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 982 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 982 that pertains to Anda.

983. To the extent the allegations contained in paragraph 983 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 983 consist of legal conclusions, no

response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 983 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 983 that pertains to Anda.

984. The allegations contained in paragraph 984 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

985. To the extent the allegations contained in paragraph 985 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 985 that pertains to Anda.

986. To the extent the allegations contained in paragraph 986 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 986 that pertains to Anda.

987. To the extent the allegations contained in paragraph 987 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 987 that pertains to Anda.

988. To the extent the allegations contained in paragraph 988 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 988 that pertains to Anda.

989. The allegations contained in paragraph 989 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

990. The allegations contained in paragraph 990 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

991. The allegations contained in paragraph 991 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

992. To the extent the allegations contained in paragraph 992 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 992 that pertains to Anda.

993. To the extent the allegations contained in paragraph 993 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 993 that pertains to Anda.

994. To the extent the allegations contained in paragraph 994 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 994 that pertains to Anda.

995. To the extent the allegations contained in paragraph 995 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 995 that pertains to Anda.

996. To the extent the allegations contained in paragraph 996 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 996 that pertains to Anda.

997. To the extent the allegations contained in paragraph 997 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 997 that pertains to Anda.

998. To the extent the allegations contained in paragraph 998 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda admits that it had control over its own conduct in Plaintiffs' communities regarding its own shipments of opioids, its reporting activity, and its anti-diversion policies and procedures. Anda denies each and every remaining allegation contained in paragraph 998 that pertains to Anda.

999. To the extent the allegations contained in paragraph 999 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 999 that pertains to Anda.

1000. To the extent the allegations contained in paragraph 1000 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1000 that pertains to Anda.

1001. To the extent the allegations contained in paragraph 1001 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1001 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1001 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1001 that pertains to Anda.

1002. To the extent the allegations contained in paragraph 1002 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. To the extent the allegations contained in paragraph 1002 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1002 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1002 that pertains to Anda.

1003. To the extent the allegations contained in paragraph 1003 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it is in the business of distributing prescription drugs, including opioids, some of which are substances which may pose a high potential for abuse and addiction. Anda denies each and every remaining allegation contained in paragraph 1003 that pertains to Anda.

1004. To the extent the allegations contained in paragraph 1004 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1004 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1004 that pertain to Anda. Further, to the extent that paragraph 1004 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1004 that pertains to Anda.

1005. To the extent the allegations contained in paragraph 1005 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1005 that pertains to Anda.

1006. To the extent the allegations contained in paragraph 1006 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1006 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1006 that pertains to Anda.

1007. To the extent the allegations contained in paragraph 1007 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1007 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1007 that pertain to Anda. Further, to the extent that paragraph 1007 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1007 that pertains to Anda.

1008. To the extent the allegations contained in paragraph 1008 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1008 that pertain to Anda. Further, to the extent that paragraph 1008 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1008 that pertains to Anda.

1009. To the extent the allegations contained in paragraph 1009 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1009 that pertain to Anda. Further, to the extent that paragraph 1009 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1009 that pertains to Anda.

1010. To the extent the allegations contained in paragraph 1010 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1010 that pertain to Anda. Further, to the extent that paragraph 1010 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1010 that pertains to Anda.

1011. To the extent the allegations contained in paragraph 1011 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1011 that pertain to Anda. Further, to the extent that paragraph 1011 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1011 that pertains to Anda.

1012. To the extent the allegations contained in paragraph 1012 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such

allegations contained in paragraph 1012 that pertain to Anda. Further, to the extent that paragraph 1012 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1012 that pertains to Anda.

1013. To the extent the allegations contained in paragraph 1013 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1013 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1013 that pertain to Anda. Further, to the extent that paragraph 1013 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1013 that pertains to Anda.

1014. To the extent the allegations contained in paragraph 1014 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1014 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1014 that pertain to Anda. Further, to the extent that paragraph 1014 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

Anda denies each and every remaining allegation contained in paragraph 1014 that pertains to Anda.

1015. The allegations contained in paragraph 1015 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1015 that pertain to Anda. To the extent the allegations contained in paragraph 1015 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent that paragraph 1015 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1015 that pertains to Anda.

1016. To the extent the allegations contained in paragraph 1016 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1016 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1016 that pertain to Anda. Further, to the extent that paragraph 1016 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1016 that pertains to Anda.

1017. To the extent the allegations contained in paragraph 1017 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1017 that pertains to Anda.

1018. To the extent the allegations contained in paragraph 1018 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1018 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1018 that pertain to Anda. Further, to the extent that paragraph 1018 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1018 that pertains to Anda.

1019. No response is required to paragraph 1019, pursuant to the dismissal of Plaintiffs' negligence per se claims in the Judge Dan Aaron Polster's June 13, 2019 Opinion and Order issued in *In re: National Prescription Opiate Litigation*, Case No. 1:17-md-2804, Dkt. 1680.

1020. No response is required to paragraph 1020, pursuant to the dismissal of Plaintiffs' negligence per se claims in the Judge Dan Aaron Polster's June 13, 2019 Opinion and Order issued in *In re: National Prescription Opiate Litigation*, Case No. 1:17-md-2804 (N.D. Ohio), Dkt. 1680.

1021. No response is required to paragraph 1021, pursuant to the dismissal of Plaintiffs' negligence per se claims in the Judge Dan Aaron Polster's June 13, 2019 Opinion and Order issued in *In re: National Prescription Opiate Litigation*, Case No. 1:17-md-2804 (N.D. Ohio), Dkt. 1680.

1022. No response is required to paragraph 1022, pursuant to the dismissal of Plaintiffs' negligence per se claims in the Judge Dan Aaron Polster's June 13, 2019 Opinion and Order issued in *In re: National Prescription Opiate Litigation*, Case No. 1:17-md-2804 (N.D. Ohio), Dkt. 1680.

1023. The allegations contained in paragraph 1023 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 1023 that pertain to Anda.

1024. To the extent the allegations contained in paragraph 1024 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1024 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1024 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1024 that pertains to Anda.

1025. To the extent the allegations contained in paragraph 1025 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1025 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1025 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1025 that pertains to Anda.

1026. To the extent the allegations contained in paragraph 1026 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1026 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1026 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1026 that pertains to Anda.

1027. To the extent the allegations contained in paragraph 1027 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1027 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1027 that pertain to Anda. To the extent the allegations concern Plaintiffs' claims of negligence per se no response is required, pursuant to the dismissal of Plaintiffs' negligence per se claims in the Judge Dan Aaron Polster's June 13, 2019 Opinion and Order issued in *In re: National Prescription Opiate Litigation*, Case No. 1:17-md-2804 (N.D. Ohio), Dkt. 1680. Anda denies each and every remaining allegation contained in paragraph 1027 that pertains to Anda.

1028. To the extent the allegations contained in paragraph 1028 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1028 consist of legal conclusions, no response is required. To the extent the allegations concern Plaintiffs' claims of negligence per se

no response is required, pursuant to the dismissal of Plaintiffs' negligence per se claims in the Judge Dan Aaron Polster's June 13, 2019 Opinion and Order issued in *In re: National Prescription Opiate Litigation*, Case No. 1:17-md-2804 (N.D. Ohio), Dkt. 1680. To the extent a response is required, Anda denies all such allegations contained in paragraph 1028 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1028 that pertains to Anda.

1029. To the extent the allegations contained in paragraph 1029 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1029 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1029 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1029 that pertains to Anda.

1030. To the extent the allegations contained in paragraph 1030 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1030 that pertain to Anda. Further, to the extent that paragraph 1030 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1030 that pertains to Anda.

1031. To the extent the allegations contained in paragraph 1031 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1031 consist of legal conclusions, no

response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1031 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1031 that pertains to Anda.

1032. To the extent the allegations contained in paragraph 1032 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1032 that pertains to Anda.

1033. To the extent the allegations contained in paragraph 1033 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1033 that pertains to Anda.

1034. The allegations contained in paragraph 1034 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1035. To the extent the allegations contained in paragraph 1035 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1035 that pertains to Anda.

1036. To the extent the allegations contained in paragraph 1036 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1036 that pertains to Anda.

1037. The allegations contained in paragraph 1037 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1037 that pertain to Anda. Further, to the extent that paragraph 1037 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

1038. The allegations contained in paragraph 1038 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1039. To the extent the allegations contained in paragraph 1039 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1039 that pertains to Anda.

1040. To the extent the allegations contained in paragraph 1040 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1040 that pertains to Anda.

1041. To the extent the allegations contained in paragraph 1041 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1041 that pertains to Anda.

1042. To the extent the allegations contained in paragraph 1042 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1042 that pertains to Anda.

1043. To the extent the allegations contained in paragraph 1043 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1043 that pertains to Anda.

1044. To the extent the allegations contained in paragraph 1044 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1044 that pertains to Anda.

1045. To the extent the allegations contained in paragraph 1045 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1045 that pertains to Anda.

1046. To the extent the allegations contained in paragraph 1046 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1046 that pertains to Anda.

1047. To the extent the allegations contained in paragraph 1047 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1047 that pertains to Anda.

1048. To the extent the allegations contained in paragraph 1048 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1048 that pertains to Anda.

1049. To the extent the allegations contained in paragraph 1049 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1049 that pertains to Anda.

1050. The allegations contained in paragraph 1050 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all

allegations contained in paragraph 1050 that pertain to Anda and specifically denies that Plaintiffs are entitled to any such relief against Anda.

SEVENTH CLAIM FOR RELIEF

Common Law Fraud (Against the Marketing Defendants)

1051. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1050 of the CFAC.

1052-1069. The allegations contained in paragraphs 1052-1069 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

EIGHTH CLAIM FOR RELIEF

Unjust Enrichment (Against All Defendants)

1070. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1069 of the CFAC.

1071. To the extent the allegations contained in paragraph 1071 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1071 that pertains to Anda.

1072. To the extent the allegations contained in paragraph 1072 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1072 that pertains to Anda.

1073. The allegations contained in paragraph 1073 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1073 that pertain to Anda.

1074. To the extent the allegations contained in paragraph 1074 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1074 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1074 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1074 that pertains to Anda.

1075. To the extent the allegations contained in paragraph 1075 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1075 that pertains to Anda.

1076. To the extent the allegations contained in paragraph 1076 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1076 that pertains to Anda.

1077. To the extent the allegations contained in paragraph 1077 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1077 that pertains to Anda.

1078. To the extent the allegations contained in paragraph 1078 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1078 that pertains to Anda.

1079. To the extent the allegations contained in paragraph 1079 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1079 that pertains to Anda.

1080. To the extent the allegations contained in paragraph 1080 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1080 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1080 that pertain to Anda. Further, to the extent that paragraph 1080 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

Anda denies each and every remaining allegation contained in paragraph 1080 that pertains to Anda.

1081. To the extent the allegations contained in paragraph 1081 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1081 that pertains to Anda.

1082. To the extent the allegations contained in paragraph 1082 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1082 that pertains to Anda.

1083. To the extent the allegations contained in paragraph 1083 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1083 that pertains to Anda.

1084. To the extent the allegations contained in paragraph 1084 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1084 that pertains to Anda.

1085. The allegations contained in paragraph 1085 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1086. The allegations contained in paragraph 1086 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 1086 that pertain to Anda and specifically denies that Plaintiffs are entitled to any such relief against Anda.

NINTH CLAIM FOR RELIEF

Civil Conspiracy (Against All Defendants)

1087. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1086 of the CFAC.

1088. To the extent the allegations contained in paragraph 1088 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1088 that pertains to Anda.

1089. To the extent the allegations contained in paragraph 1089 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1089 that pertains to Anda.

1090. The allegations contained in paragraph 1090 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1091. To the extent the allegations contained in paragraph 1091 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1091 that pertains to Anda.

1092. To the extent the allegations contained in paragraph 1092 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1092 that pertains to Anda.

1093. To the extent the allegations contained in paragraph 1093 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1093 that pertains to Anda.

1094. To the extent the allegations contained in paragraph 1094 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1093 that pertains to Anda.

1095. To the extent the allegations contained in paragraph 1095 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1095 that pertains to Anda.

1096. To the extent the allegations contained in paragraph 1096 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1096 that pertains to Anda.

1097. To the extent the allegations contained in paragraph 1097 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1097 that pertains to Anda.

1098. To the extent the allegations contained in paragraph 1098 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1098 that pertains to Anda.

1099. To the extent the allegations contained in paragraph 1099 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1099 that pertains to Anda.

1100. To the extent the allegations contained in paragraph 1100 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1080 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1080 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1100 that pertains to Anda.

1101. To the extent the allegations contained in paragraph 1101 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1101 that pertains to Anda.

1102. To the extent the allegations contained in paragraph 1102 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1102 that pertains to Anda.

1103. To the extent the allegations contained in paragraph 1103 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1103 that pertains to Anda.

1104. The allegations contained in paragraph 1104 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1105. To the extent the allegations contained in paragraph 1105 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1105 that pertains to Anda.

1106. The allegations contained in paragraph 1106 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all allegations contained in paragraph 1106 that pertain to Anda and specifically denies that Plaintiffs are entitled to any such relief against Anda.

TENTH CLAIM FOR RELIEF

Violations of Montana Unfair Trade Practices and Consumer Protection Act, MCA §30-14-104, *et seq.* (Against All Defendants)

1107. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1106 of the CFAC.

1108. The allegations contained in paragraph 1108 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1108 that pertain to Anda. Further, to the extent that paragraph 1108 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

1109. To the extent the allegations contained in paragraph 1109 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1109 that pertains to Anda.

1110. To the extent the allegations contained in paragraph 1110 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1110 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1110 that pertain to Anda. Further, to the extent that paragraph 1110 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1110 that pertains to Anda.

1111. The allegations contained in paragraph 1111 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1112. The allegations contained in paragraph 1112 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1113. To the extent the allegations contained in paragraph 1113 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1113 that pertains to Anda.

1114. To the extent the allegations contained in paragraph 1114 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1114 that pertains to Anda.

1115. To the extent the allegations contained in paragraph 1115 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1115 that pertain to Anda. Further, to the extent that paragraph 1115 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

1116. To the extent the allegations contained in paragraph 1116 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1116 that pertain to Anda. Further, to the extent that paragraph 1116 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

1117. To the extent the allegations contained in paragraph 1117 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1117 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations

contained in paragraph 1117 that pertain to Anda. Further, to the extent that paragraph 1117 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1117 that pertains to Anda.

1118. To the extent the allegations contained in paragraph 1118 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1118 consist of legal conclusions, no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1118 that pertain to Anda. Further, to the extent that paragraph 1118 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1118 that pertains to Anda.

1119. The allegations contained in paragraph 1119 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 1119 that pertain to Anda and specifically denies that Plaintiffs are entitled to any such relief against Anda.

PUNITIVE DAMAGES

1120. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1119 of the CFAC.

1121. To the extent the allegations contained in paragraph 1121 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1121 that pertains to Anda.

1122. To the extent the allegations contained in paragraph 1122 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1122 that pertains to Anda.

1123. To the extent the allegations contained in paragraph 1123 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1123 that pertains to Anda.

1124. Paragraph 1124 sets forth a prayer for relief to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 1124 that pertain to Anda and specifically denies that Plaintiffs are entitled to any such relief against Anda.

AFFIRMATIVE DEFENSES

Pursuant to Fed. R. Civ. P. 8(c), Anda hereby set forth the following affirmative defenses and reserve the right to raise additional affirmative defenses based on information learned through discovery.

In asserting these affirmative defenses, Anda does not assume the burden to establish any fact or proposition where that burden is properly imposed on Plaintiffs. The affirmative defenses that follow are pled in the alternative and none should be construed as an admission of liability by Anda or that Plaintiffs are entitled to relief.

First Affirmative Defense

The CFAC fails to state a claim upon which relief can be granted.

Second Affirmative Defense

This Court lacks subject matter jurisdiction over all or some of the claims asserted by Plaintiffs.

Third Affirmative Defense

Some or all of Plaintiffs' claims are preempted by federal law, insofar as they conflict with Congress' purposes and objectives in enacting relevant federal legislation and authorizing regulations.

Fourth Affirmative Defense

The Court lacks subject matter jurisdiction based on the failure to exhaust administrative remedies.

Fifth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by the political question and separation of powers doctrines.

Sixth Affirmative Defense

Plaintiffs lack standing to assert all or some of their claims in this lawsuit.

Seventh Affirmative Defense

Plaintiffs have failed to plead that any specific prescription for an opioid written and dispensed in the relevant jurisdictions, and which Plaintiffs claim caused them harm, was distributed into the relevant jurisdictions by Anda.

Eighth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because the harm alleged was proximately caused by the negligence, gross negligence, or criminal, and/or intentional and malicious acts of intervening third parties not under the control of Anda.

Ninth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by contributory negligence.

Tenth Affirmative Defense

Plaintiffs' claims are barred because Plaintiffs failed to join one or more indispensable parties, including but not limited to the DEA, and healthcare providers, prescribers, patients, and other third parties whom Plaintiffs allege engaged in the prescription, dispensing, diversion or use of the opioids at issue.

Eleventh Affirmative Defense

Plaintiffs' claims against Anda are barred, in whole or in part, because they have suffered no damages as a result of the matters alleged in the CFAC.

Twelfth Affirmative Defense

Recovery from Anda is barred, in whole or in part, by the free public services doctrine.

Thirteenth Affirmative Defense

Plaintiffs' claims against Anda are barred because Anda has complied with all applicable federal, state and local statutes, regulations and rules related to the distribution of opioids.

Fourteenth Affirmative Defense

Plaintiffs' claims against Anda are barred, in whole or in part, by the applicable statutes of limitations and repose.

Fifteenth Affirmative Defense

Plaintiffs' claims against Anda are barred, in whole or in part, by the doctrines of laches, estoppel, and waiver.

Sixteenth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because they violate the *Ex Post Facto* clauses of Article I of the United States Constitution, insofar as Plaintiffs seek to impose liability retroactively for conduct that was not actionable at the time it occurred.

Seventeenth Affirmative Defense

Any and all of the injuries or damages suffered by Plaintiffs resulted solely from conduct and/or conditions for which Anda is not responsible and for which it cannot be held liable.

Eighteenth Affirmative Defense

Any and all of the injuries or damages allegedly suffered by Plaintiffs resulted solely from the acts of others for whom Anda may not be held liable.

Nineteenth Affirmative Defense

Plaintiffs' claims against Anda are misjoined with Plaintiffs' claims against other defendants and must be severed.

Twentieth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by Plaintiffs' failure to mitigate damages.

Twenty-first Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because the claims are speculative and remote; and because of the impossibility of ascertaining and allocating the alleged damages.

Twenty-second Affirmative Defense

To the extent that Plaintiffs seek equitable relief against Anda, Plaintiffs are not entitled to such relief because Plaintiffs have an adequate remedy at law.

Twenty-third Affirmative Defense

Plaintiffs' claims for unjust enrichment are barred because Anda has not accepted or retained any benefits under circumstances where it would be inequitable for Anda to do so.

Twenty-fourth Affirmative Defense

Plaintiffs' claims for unjust enrichment are barred because Plaintiffs have no authority to bring such claims on behalf of itself or the citizens of its respective jurisdiction.

Twenty-fifth Affirmative Defense

Plaintiffs' claims for unjust enrichment are barred because Plaintiffs did not pay Anda any of the amounts sought.

Twenty-sixth Affirmative Defense

Plaintiffs have not suffered, and will not suffer, any injury to a legally protected or cognizable interest by reason of Anda's conduct as alleged in the CFAC.

Twenty-seventh Affirmative Defense

Plaintiffs lack capacity to bring their claims, including claims indirectly maintained on behalf of their citizens and claims brought as *parens patriae*.

Twenty-eighth Affirmative Defense

Plaintiffs' claims for injunctive relief are barred because they are punitive in nature.

Twenty-ninth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by the Due Process Clause of the Fifth and Fourteenth Amendments to the United States Constitution because substantive due process

forbids the retroactive imposition of changing and unclear legal interpretations of the Controlled Substances Act.

Thirtieth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because Anda is specifically licensed by the DEA and each of the fifty (50) states to distribute the controlled substances referred to in the CFAC to certain licensed purchasers within the respective jurisdiction.

Thirty-first Affirmative Defense

Plaintiffs' commencement and prosecution of this action is arbitrary and capricious, and its claims are contrary to the Controlled Substances Act, and rules and regulations promulgated pursuant to that Act.

Thirty-second Affirmative Defense

Plaintiffs lack authority to bring their claims under the Controlled Substances Act.

Thirty-third Affirmative Defense

Plaintiffs lack authority to bring their claims because Plaintiffs are not authorized to pursue common law claims on behalf of residents or citizens of their respective jurisdictions.

Thirty-fourth Affirmative Defense

The CFAC fails to state a claim against Anda because Plaintiffs cannot establish a right common to the general public with which Anda unreasonably interfered.

Thirty-fifth Affirmative Defense

Anda adopts by reference all defenses asserted in any party's motion to dismiss filed in this MDL.

Thirty-sixth Affirmative Defense

An award of punitive damages would be in violation of Anda's rights to procedural due process under the Fourteenth Amendment of the United States Constitution.

Thirty-seventh Affirmative Defense

To the extent Plaintiffs assert a claim for punitive damages against Anda by virtue of the matters set forth in the CFAC, Plaintiffs are not entitled to any punitive damages because the alleged conduct of Anda cannot be determined in any manner to have been in willful, wanton or reckless disregard of the rights of Plaintiffs.

Thirty-eighth Affirmative Defense

An award of punitive damages would violate Anda's right to protection from excessive fines as provided in the Eighth Amendment of the United States Constitution and violate Anda's rights to substantive due process as provided in the Fifth and Fourteenth Amendments of the United States Constitution.

Thirty-ninth Affirmative Defense

To the extent Plaintiffs assert a claim for punitive damages against Anda, punitive damages may not be assessed against any Defendant for the conduct of another Defendant or entity.

Fortieth Affirmative Defense

Plaintiffs' claim for punitive damages violates, and is therefore barred by, the provisions of the Constitution of the United States upon the following grounds:

- a. It is a violation of the due process and equal protection clauses to impose punitive damages against a civil defendant upon the Plaintiffs' satisfaction of a burden of proof less than the burden of proof that is required in criminal cases.
- b. The procedures under which punitive damages may be awarded fail to provide a reasonable or substantive limit on the amount of the award which may be levied against Anda.

- c. The procedures under which punitive damages may be awarded fail to provide specific standards for the amount of the award against Anda.
- d. The procedures under which punitive damages may be awarded result in the imposition of differing penalties for the same or similar acts.
- e. The procedures under which punitive damages may be awarded permit the imposition of such damages in excess of the maximum possible criminal fines for the same or similar acts.

Forty-first Affirmative Defense

Anda affirmatively states that it maintains thorough procedures for shipping prescription medications into the relevant jurisdiction.

Forty-second Affirmative Defense

Plaintiffs' claims are barred by the doctrine of primary jurisdiction.

Forty-third Affirmative Defense

Anda's rights under the Due Process Clause of the U.S. Constitution are violated by any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding. *See, e.g., Marshall v. Jerrico, Inc.*, 446 U.S. 238 (1980).

Forty-fourth Affirmative Defense

Plaintiffs' claims are barred by the learned intermediary doctrine.

Forty-fifth Affirmative Defense

To the extent Plaintiffs are alleging fraud, fraudulent concealment, or similar conduct, Plaintiffs have failed to plead the allegations with sufficient particularity.

Forty-sixth Affirmative Defense

Plaintiffs fail to plead any actionable misrepresentation or omission made by or attributable to Anda.

Forty-seventh Affirmative Defense

Plaintiffs are precluded from recovering against Anda pursuant to applicable law following section 402A of the Restatement (Second) of Torts.

Forty-eighth Affirmative Defense

Plaintiffs' recovery is barred under Section 6(c) of the Restatement of Torts (Third).

Forty-ninth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have no private right of action under the relevant laws and regulations.

Fiftieth Affirmative Defense

Anda did not owe or breach any statutory or common law duty to Plaintiffs.

Fifty-first Affirmative Defense

Plaintiffs' claims and damages are barred or limited, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers by a municipality.

Fifty-second Affirmative Defense

Plaintiffs are barred from recovery by application of the informed consent doctrine.

Fifty-third Affirmative Defense

Plaintiffs' claims are barred to the extent they are based on alleged violations of industry customs because purported industry customs do not impose legal duties on Anda.

Fifty-fourth Affirmative Defense

Plaintiffs' claims are barred by the assumption of risk doctrine.

Fifty-fifth Affirmative Defense

Plaintiffs' claims are barred in whole or in part, or are subject to other limitations, by Montana Code Annotated § 17-1-719.

Fifty-sixth Affirmative Defense

Plaintiffs lack the statutory authority to bring a nuisance claim under Montana law.

Fifty-seventh Affirmative Defense

Plaintiffs' claim for public nuisance is barred or limited because Anda's conduct, as alleged in the CFAC, did not involve interference with real property.

Fifty-eighth Affirmative Defense

Plaintiffs' claim for public nuisance is barred or limited because illegal conduct by third parties involve the use of an otherwise legal product does not involve a public right upon which to base a claim for public nuisance.

Fifty-ninth Affirmative Defense

Anda is not liable for any statements made by any other Defendant.

Sixtieth Affirmative Defense

Plaintiffs' claims are barred to the extent that opioid products at issue were misused, modified, altered or changed from the condition in which they were sold, which misuse, modification, alteration or change caused or contributed to Plaintiffs' alleged injuries or damages.

Sixty-first Affirmative Defense

Anda is not liable for any injuries or expenses allegedly incurred by Plaintiffs to the extent the injuries or expenses as alleged may have resulted from the pre-existing and/or unrelated medical conditions of the users of the opioid products at issue.

Sixty-second Affirmative Defense

Any injuries and/or damages sustained by Plaintiffs were caused, in whole or in part, by their own failure to effectively enforce the law and prosecute violations thereof and any recovery by Plaintiffs is barred or, alternatively, should be diminished according to their own fault.

Sixty-third Affirmative Defense

Plaintiffs may not recover against Anda because the methods, standards, or techniques for distributing opioid products complied with and were in conformity with the generally recognized state of the art at the time the product was distributed.

Sixty-fourth Affirmative Defense

To the extent that Plaintiffs rely on letters or other informal guidance from the DEA to establish Anda's regulatory duties, such informal guidance cannot enlarge Anda's regulatory duties in the absence of compliance by DEA with the requirements of the Administrative Procedures Act, 5 U.S.C. § 551 *et seq.*

Sixty-fifth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by the economic loss doctrine.

Sixty-sixth Affirmative Defense

Plaintiffs' claims against Anda are barred, in whole or in part, to the extent they rely, explicitly or implicitly, on a theory of market-share liability.

Sixty-seventh Affirmative Defense

Plaintiffs' claims against Anda are barred, reduced and/or limited pursuant to the applicable Montana statutory and common laws regarding limitations of awards, caps on recovery and setoffs.

Sixty-eighth Affirmative Defense

Should Anda be held liable to Plaintiffs, which liability is specifically denied, Anda would be entitled to a credit or set-off for all sums of money received or available from or on behalf of any tortfeasor(s) for the same injuries alleged in the CFAC.

Sixty-ninth Affirmative Defense

Plaintiffs' claims are barred and/or reduced by contributory or comparative negligence and contributory or comparative fault.

Seventieth Affirmative Defense

Anda will request apportionment of fault pursuant to Montana Code Annotated § 27-1-703 of all parties who may be jointly and severally liable for all or part of Plaintiffs' alleged injuries, losses or damages.

Seventy-first Affirmative Defense

Plaintiffs' claims are barred in whole or in part by the Dormant Commerce Clause of the United States Constitution.

Seventy-second Affirmative Defense

Anda is entitled to, and claims the benefit of, all defenses and presumptions set forth in or arising from any rule of law or statute of this State or any other state whose substantive law might control the action.

Seventy-third Affirmative Defense

Plaintiffs' claims are subject to all defenses that could be asserted if Plaintiffs' claims were properly made by individuals on whose behalf or for whose alleged damages Plaintiffs seek to recover.

Seventy-fourth Affirmative Defense

Anda adopts by reference any additional applicable defense pled by any other Defendants not otherwise pled herein. Anda hereby gives notice that it intends to rely upon any other and additional defense that is now or may become available or appear during or as a result of the

discovery proceedings in this action and hereby reserves its right to amend its answer to assert such defense.

WHEREFORE, Anda denies that Plaintiffs are entitled to any relief whatsoever. Anda further request that this Court enter judgment in Anda's favor and against Plaintiffs as follows:

- a. That Plaintiffs take nothing by reason of their Corrected First Amended Complaint and that judgment be rendered in favor of Anda;
- b. For such other relief as this Court deems just and proper.

JURY DEMAND

Anda hereby demands trial by jury as to all issues so triable.

Dated: July 26, 2019

Respectfully submitted,

/s/ James W. Matthews

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of July 2019, the foregoing was served on all counsel of record via the Court's electronic filing system.

/s/ James W. Matthews
James W. Matthews